Mr. Martin Landis Solid Waste Project Manager, Plan Review Unit Solid Waste Section Arizona Department of Environmental Quality 3003 North Central Avenue Phoenix, Arizona 85012-2905

Subject: Response to ADEQ's Comments

Dear Mr. Landis:

On behalf of the City of Flagstaff (City), Woodward-Clyde is pleased to respond to your letter dated June 4, 1998 concerning administrative completeness of the Cinder Lake MSWLF Solid Waste Facility Plan (SWFP). Responses to ADEQ's comments are presented as follows:

Comment 1:

The Federal Emergency Management Agency (FEMA) does not print flood insurance rate maps for the project site area (Parcel number 040019 3375B). However, FEMA has determined the area to be a Zone C area, meaning the area is outside a 500-year flood zone.

Section 4.2 has been changed to include this information.

Comment 2:

The Cinder Lake Vicinity Map, Figure 3-2, indicates an airstrip is located approximately 2 to 3 miles south of the landfill site. This airstrip, which was once an airfield operated by the City of Flagstaff, has been out of service for years and the area is now residential.

Comment 3:

Copies of the draft and final EAs have been previously provided to the ADEQ and should be in the Cinder Lake Landfill file at ADEQ. Copies are also available from the City of Flagstaff Department of Public Works.

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Comment 4:

A reference to the Quaternary Fault Map (Figure G-1, Appendix G) has been included in Section 4.5.

Comment 5:

No response required.

Comment 6:

As discussed in Section 5.3.3, a letter of land use approval will be obtained from Loconino County upon transfer of land of the SWFP ownership. The land transfer is anticipated to be completed by _____.

An extensive public involvement program was performed during the selection of the lateral expansion site. The public involvement program consisted of soliciting comments through newspaper notices, formal and informal discussions and public meetings, letters sent directly to homeowners and interested parties, and notices posted at the existing landfill site and other sites in the community. This process is discussed in the draft and final EAs which have been previously provided to the ADEQ. A summary of the program is discussed below.

After informal discussions with the USFS, and meetings with representatives from community and environmental groups, the Proposal for Continued Long Term Use of the Cinder Lake Landfill (Appendix C) was prepared. To initiate the formal scoping process, a copy of the this proposal was sent via first-class mail to land owners and interested parties. Addresses and names of land owners within three miles of the proposed expansion were obtained from the country assessor and the interested party list was provided by the Coconino National Forest Supervisor. In addition, a notice detailing the proposed expansion site was posted at the Landfill entrance and the proposal was submitted to *the Arizona Daily Sun* by Northland Research, Inc.

After completion of the draft EA, notices soliciting community responses were mailed via first class to the addressees mentioned above. These notices also provided the date and time of a public hearing which was held on October 18, 1995 to gather additional comments from the public. As required by the USFS, notices were also posted at the Landfill entrance, at 2 fire stations in the area, at the nearest school (Cromer), at the Doney Park Water District office and at the 2 general stores in the project area. Based on the responses received from the public, the proposed lateral expansion was reconfigured to eliminate the proposed

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expansion to the south and to expand further than originally proposed to the east so that no expansion towards existing residential properties would occur. The USFS owns all land within three miles eastward of the proposed lateral expansion (see Figure 3-2 in the SWFP).

The City understands that ADEQ cannot approve the expansion until the property purchase is complete.

Comment 7:

No response required.

Comment 8:

Section 7.1.5 has been reworded to more clearly address ADEQ's comments.

Comment 9:

Section 7.1.12 discusses fire control procedures which are used at CLL. These fire control procedures are reviewed as part of the employee training program which is discussed in Section 7.1.5.1. Section 7.1.12 has been changed for clarification.

Comment 10:

Section 7.1.16 has been changed in response to ADEQ's comments.

Comment 11:

Section 7.2.8.2 has been changed in response to ADEQ's comments.

Comment 12:

As discussed in our recent telephone conversation, topographic, geologic and soil features at the site minimize the need for additional storm water control features. To date, runon has not been observed at the landfill. This is believed to be the result of the semi-arid environment, the relatively flat topography of the site and the surrounding area, and the moderate to high permeability of the native soils. Runoff is only anticipated to occur from elevated landfill slopes. Runoff from these slopes currently infiltrates into the cinders immediately adjacent to the landfill slopes. This may change as the landfill develops vertically, resulting in runoff from a larger watershed. Methods to control such runoff are discussed in Section 8.2. These methods will be employed as necessary for all future development at the site.

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Vertical development of the northeastern portion of the existing landfill Area A is anticipated to start this year. A plan sheet showing interim stormwater control for the vertical development of this area is included with this letter. Similar plans will be prepared for areas B and C approximately 6 months prior to landfilling in these areas.

Sheet 6 shows a conceptual design for stormwater control in the expansion area. Prior to each phase of development within the lined expansion area, construction documents will be prepared and submitted to ADEQ (see Section 8.1.2). The construction documents will include an interim storm water control system for each phase.

Comment 13:

See response to Comment 9.

Two copies of revised pages (4-1 to 4-3, 7-3, 7-8, 7-9 and 7-12) have been provided. The date of the revisions is shown in the footer of these pages. Additionally, a 'cross-out and underline' version of the changes has been provided to facilitate review. If additional information is required, please call Ben Fisk at (520) 779-7660 x276, or me at (619) 683-6112.

Very truly yours,

WOODWARD-CLYDE INTERNATIONAL-AMERICAS

David E. Marx Project Manager

DEM/JWM:sm

Attachments

cc: Mr. Ben Fisk, City of Flagstaff

Mr. Harley Grosvenor, City of Flagstaff